

CPF Draft PERMIT PLAN REQUIREMENT	Draft Permit Deadline, month after permit effective Date	Proposed Revised Deadline, (mo.s)	Special Requirements	Reason For Proposed Deadline Revision
Operations & Maintenance Plan	6	18	Include operational changes needed to minimize EFF TP as required by II.C.3.a. (II.C. is the QAP; ref. should be II. B.3.a., Phosphorus Mgt Plan). Depends on the Phos Mgt Plan completion.	Need input from PMP
Toxics Management Plan	6	18	Submit TMP to EPA and IDEQ	Need 12 months of monitoring to develop plan
Toxics Management	12	18	Implement the TMP, to reduce PCBs and Dioxin to "maximum extent practicable."	Time line dependent on TMP development.
Phosphorus Management Plan	18		Include QA data required by II.C.1-5 (QAP). Evaluate TP reduction potential of WRF and industrial users, identify goals; work with IUs to reduce TP.	
Quality Assurance Plan	3	6	For all permit monitoring; explain anomalies; training; change management. Depends on the TTF QAP recommendations.	Requires input from TTF on toxics sampling and analytical methods.
Emergency Response and Public Notification Plan	6		Include notification and response procedures for SSOs, bypass and upset	
Pretreatment Program	6	12	Extensive "approvable" submittal to meet 40CFR403.8 for delegated authority. Post Falls has submitted a draft to EPA, but we need a consultant to review and revise it prior to final submittal.	Need 12 months for consultant selection, review, revision and submittal.